

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

LEIGHTON TECHNOLOGIES LLC,

Plaintiff and Counterclaim Defendant,

V.

OBERTHUR CARD SYSTEMS, S.A.,

Defendant and Counterclaim Plaintiff.

04 Civ. 02496 (CM)(LMS)

Hon. Colleen McMahon

**DECLARATION OF NEIL G. COHEN IN SUPPORT OF
PLAINTIFF'S BRIEF IN SUPPORT OF ITS CLAIM CONSTRUCTION**

DECLARATION OF NEIL G. COHEN

I, Neil G. Cohen, declare as follows:

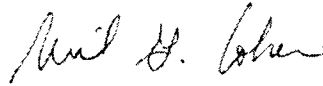
1. I am an attorney admitted to practice before this Court in the above-referenced litigation.

I have personal knowledge of the following, and if called to testify under oath in these proceedings, I would competently testify thereto.

2. Attached as Exhibit A is a true and correct copy of United States Patent No. 5,817,207.
3. Attached as Exhibit B is a true and correct copy of United States Patent No. 6,036,099.
4. Attached as Exhibit C is a true and correct copy of United States Patent No. 6,214,155.
5. Attached as Exhibit D is a true and correct copy of United States Patent No. 6,514,367.
6. Attached as Exhibit E is a true and correct copy of United States Patent No. 4,450,024.
7. Attached as Exhibit F is a true and correct copy of United States Patent No. 5,519,201.
8. Attached as Exhibit G is a true and correct copy of the prosecution history of United States Patent No. 5,817,207 (excluding copies of references cited therein).
9. Attached as Exhibit H is a true and correct copy of the prosecution history of United States Patent No. 6,214,155 (excluding copies of references cited therein).
10. Attached as Exhibit I is a true and correct copy of the prosecution history of United States Patent No. 6,036,099 (excluding copies of references cited therein).
11. Attached as Exhibit J is a true and correct copy of the prosecution history of United States Patent No. 6,514,367 (including copies of references cited therein).
12. Attached as Exhibit K is a true and correct copy of the "Definitive List Of Claims To Be Construed By The Court" (filed October 15, 2004).
13. Attached as Exhibit L is a true and correct copy of "Claim Tables" compiled from the website of the United States Patent And Trademark Office (www.uspto.gov).

14. Attached as Exhibit M is a true and correct copy of excerpts from *Dictionary of Scientific and Technical Terms* (Sybil P. Parker ed., McGraw Hill 5th ed 1994).
15. Attached as Exhibit N is a true and correct copy of excerpts from *Electronic Packaging, Microelectronics, and Interconnection Dictionary* p. 26 (Harper et al., McGraw-Hill, Inc. 1993).
16. Attached as Exhibit O is a true and correct copy of excerpts from *Webster's Collegiate Dictionary, 10th Ed.*, © 1999; principal © 1993.
17. Attached as Exhibit P is a true and correct copy of excerpts from *Dictionary of Composite Materials* (Stuart Lee ed., Technomic Publishing Co., Inc. 1989).

I declare under penalty of perjury that the foregoing is true and correct. Executed this 5th day of November 2004, at Suffern, New York



Neil G. Cohen